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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 5

77 West Jackson Boulevard
Chicago, IL 60604-3590REPLY TO ATTENTION OF:
SR-6J

June 17, 2003

MAJ David Quivey, Project Officer
Department of the Army
Assistant Chief of Staff for Installation Management
600 Army Pentagon
Washington, DC 20310-0600

SUBJECT: Review Comments on *Draft Construction Completion Report for Various Site Remediations for the Fort Dearborn U.S. Army Reserve Center, Chicago, Illinois, April 29, 2003*

Dear MAJ Quivey:

The United States Environmental Protection Agency Region 5 (U.S. EPA) has reviewed the *Draft Construction Completion Report for Various Site Remediations at Fort Dearborn U.S. Army Reserve Center, Chicago, Illinois, April 29, 2003*, received in our office in May 2003. The Draft Construction Completion Report includes the Draft Data Validation Report. Our comments are attached to this letter.

Thank you for the opportunity to review the subject Draft Construction Completion Report. I am available to discuss the enclosed comments with you and your staff. If you have any questions, please feel free to call me at (312) 886-6150.

Sincerely,

Karen L. Mason-Smith

Remedial Project Manager

Enclosure

cc: D. Meadors, ACOE-Louisville, KY
Colonel Fougner, Director, Army Reserve Division
J. Vranicar, Field & Golan
M. Chrystof, U.S. EPA
A. Jankowski, IEPA

R. Suda, MWH Global
D. Graham, City of Chicago
C. Wilinski, Deputy Commissioner

**U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5 COMMENTS
DRAFT CONSTRUCTION COMPLETION REPORT
FOR VARIOUS SITE REMEDIATIONS
FT. DEARBORN, IL**

SPECIFIC COMMENTS:

1. **Section 1.1 Background, 3rd paragraph, p.2:** Why was the fifth Category 7 site (Indoor Firing Range) not included in this Construction Completion Report (CCR)? The Indoor Firing Range (Site ORD-1) was included in the December 2001 Final Work Plan For Various Site Remediations at Fort Dearborn. Please add a section to the CCR to include any deviations from the work plan and unplanned occurrences
2. **Section 1.3 Project Scope and Objectives, 3rd paragraph, p.4:** The CCR states that the “scope of work also included removal of an empty unattached 250-gallon above-ground storage tank (AST) that was resting on the ground near the north side of the OMS Building. No further information regarding the disposition of the tank is available.”

Did the Army’s contractor perform any sampling near the north side of the OMS Building, or suspect any potential contamination in this area?
3. **Section 3.1.5 Analytical Data Validation, p.15:** Text states that the independent third-party validation (to be done by USACE contractor Lee A. Knupple and Assoc.), on at least 10% of the data, was submitted separately from this document. US-EPA has not received this data validation report as yet. Please be advised that our review of this Construction Completion Report will not be complete without our ability to review the third-party data validation report, and findings.
4. **Tables Section/all SVOCs:** It was noted that for all the SVOC data tables, significant hits were listed for 2,4,6 Tribromophenol (listed as a surrogate in the SVOC analytical reports provided in Appendix D), but no listing or values for 2,4,6 Trichlorophenol (which was an actual analyte listed in the Appendix D SVOC reports). Is this a typo, or is the surrogate being reported out here?
5. **Appendix D, Case Narratives, Manual Integration:** It was noted for every case narrative, under PCB Fraction - Method 8082, there were listing of pages where manual integration took place, and the only explanation provided was a statement to “See hard copy for explanations of manual integrations”. There were no hard copy provided, nor any explanations of why any of this manual integration took place in this report. Please provide an explanation of what manual integrations took place, why they were necessary, and if it was deemed justified.
6. **Appendix D, Lab Report 301101:** The sample VWR-008-02-EBT appears on the chain

of custody forms, and has analytical data output forms for VOCs, SVOCs, PCBs, PAHs, Glycol, and Inorganics. However, there is no listing of this data in the Tables section of this report, nor a mention in either the text of the report, or indication on the sampling Figure 4 (Former Vehicle Wash Rack) area, as to where this sample was taken or what impact (if any) this data had. Please explain.

7. **Appendix D, Lab Report 301104:** The sample OWS-005-08-EBT appears to have been run three times for VOCs (there are three separate VOC data sheets, numbered ARDL lab no.301104-01, 301104-01MS, and 301104-MD). The Tables section of the report, shows only the data for one of the samples, not the MS/MD pair. Are the hits for 1,1 dichloroethene, benzene, trichloroethene, toluene, and chlorobenzene shown in the MS and MD samples due only to the matrix spike?
8. **Appendix E, Data Validation Report:** In Section 2.13 Manual Integration, text states that the laboratory case narratives did not provide any documentation of manual integration for GC or GC/MS analysis. The raw data for only two SDGs were reviewed for evidence of manual integration. There is little or no indication from this Validation Report of why the manual integrations were done, if the manual integrations were done properly, or if they were even necessary. Furthermore, this level of review does not satisfy the requirements of the Region V Manual Integration Policy, as the text infers in the Summary Section 3.0 of this Data Validation Report. The validation did not even satisfy the requirements of the Final Project QAPP (see Final Project QAPP, , June 2002, Section 6.2.5 Manual Integration, p.32 -34). All manually integrated data (100%) must be validated by an independent third party validator. US-EPA has not yet seen the third party validation report, nor any indication that 100% of the manually integrated data has, or ever will be, validated.